

Group 1 WSEC-Commercial Public Testimony Received

The final adopted rule can be found at
https://sbcc.wa.gov/sites/default/files/2022-07/WSR_22_14_091_full2021WSEC_C.pdf

From		Subject	Response
Form letter from Cascade Natural Gas - Received from 403 individuals		Oppose Electrification Proposals 103,136,179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
Form letters from Cascade Natural Gas - Received from 90 individuals		Oppose Electrification Proposals 103,136,179	
Form Letter : Washington needs affordable energy choices that include propane and natural gas – Received from 68 individuals		Oppose Electrification Proposals 103,136,179	
Form Letter from Climate Solutions / Citizens Climate Lobby / Columbia Riverkeeper / Earth Ministry / Earthjustice / Sierra Club / Thurston Climate Action Team / Faith Action Climate Team / Washington Environmental Council / Environment WA / RE Sources / WA Physicians for Social Responsibility and others - 5,058 signatories —NOTE: This figure includes out of state/country signatories—		Support Electrification Proposals 103,136,179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
Form Letter in support of heat pump proposals – Received from 22 individuals		Support Electrification Proposals 103,136	
Date Received	From	Subject	Response
3/9/2022	Michael Frank, McKinstry Written testimony	Comments on Cost Benefit Analysis for heat pump proposals 103, 136	These two proposals were adopted into the final rule, with some editorial changes. Your comments regarding the cost benefit analysis were incorporated into the final cost benefit analysis.

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3/11/2022	Dan Kirschner, NW Gas Assoc. Written testimony	Comments on Cost Benefit Analysis for heat pump proposals 103, 136	These two proposals were adopted into the final rule, with some editorial changes. Your comments regarding the cost benefit analysis were incorporated into the final cost benefit analysis.
3/11/2022	Jerry Johnson, Johnson Economics Tamy Linver, Northwest Natural Written testimony	Comments on Heat Pump Cost Benefit Analysis	These two proposals were adopted into the final rule, with some editorial changes. Your comments regarding the cost benefit analysis were incorporated into the final cost benefit analysis.
3/11/2022	Tena Risley, Northwest HVAC/R Association Written testimony	Electrification /CBA And opposition to proposals 103, 136, 179	These proposals were adopted into the final rule, with some editorial changes. Your comments regarding the cost benefit analysis were incorporated into the final cost benefit analysis.
3/11/2022	Jonny Kocher, RMI Dylan Plummer, Sierra Club Rachel Koller, Shift Zero Alejandra Mejia Cunningham, NRDC Deepa Sivarajan, Climate Solutions Written testimony	Electrification / CBA Technical support And support for proposals 103, 136	These two proposals were adopted into the final rule, with some editorial changes. Your comments regarding the cost benefit analysis were incorporated into the final cost benefit analysis.
2/16/2022	Mike Moore, Stator/Broan-NuTone Written testimony	Proposed Modifications	The final rule as adopted by the Council includes the modifications proposed to the DOAS definition, the demand control kitchen ventilation definition, and Section C403.1.4.7, Demand responsive controls. The suggested modification to Section C403.3.5.2 was not made; the suggested exception was not seen as necessary.
3/11/2022	Michael Hedrick, McKinstry Written testimony	Proposed Modifications	<p>The Council included the suggested modification to Exception 4 of Section C403.1.4 in the final rule.</p> <p>The Council did not make any changes to Exception 5, part 1 or part 4, but did include the changes to parts 2 and 3.2. It is suggested the commenter propose language for the next code change cycle for 5.1 and 5.4.</p> <p>The proposed change to Exception 17 was included in the final rule.</p> <p>The proposed modification to Section C403.3.8.1 was included in the final rule.</p>

From	Subject	Response
		<p>The proposed modification to Section C403.3.8.2, Exception 2 was further modified in the final adopted rule to read: Individual terminal units with a design supply airflow rate ≤ 1500 cfm are exempt from the 20°F maximum temperature difference between leaving and entering water temperature requirement.</p> <p>The proposed modification to Exception 5 was not made, as it was felt it would impact the intended energy savings.</p> <p>The proposed modifications to Section C404.2.1 were not made. It was felt the suggested allowance was covered under exception 2, and the changes suggested for exception 3 are present in the referenced standards section.</p> <p>There was a modification to Section C404.2.1.4 based on another public comment that deletes the last phrase of item 4.2.</p> <p>There were no changes made to Section C404.7.1. It is suggested the commenter propose specific language during the next code cycle.</p> <p>The proposed modification to Table C503.4.6 was included in the final adopted rule.</p> <p>The typos in Section C406.3 and C406.3.5. No change was made to Table C406.3 and new section C406.3.5.2 was not added. This would need to be proposed as a change for the next cycle.</p>
3/11/2022	Jonny Kocher, RMI Written testimony	<p>Proposed Modification 103, 136</p> <p>The suggested modification to add exceptions for facilities requiring emergency backup systems was adopted as part of the final rule. The suggested language was further modified as follows: Essential facilities. Group I-2 and Group I-3 occupancies that by regulation are required to have in place redundant emergency backup systems.</p> <p>The proposed modifications to Section C503.5 were included in the final rule.</p>
3/11/2022	David Streeter, WA Hospital Association Written testimony	<p>Proposed Modification 103, 136</p> <p>The suggested modification to add exceptions for facilities requiring emergency backup systems was adopted as part of the final rule. The suggested language was further modified as follows: Essential facilities. Group I-2 and Group I-3 occupancies that by regulation are required to have in place redundant emergency backup systems.</p>
3/11/2022	Eric Vander Mey, Rushing Written testimony	<p>Proposed Modifications Section C403.5</p> <p>The suggested modification to add an additional exception for Group R-2 with a higher ERV/HRV effectiveness was adopted as part of the final rule.</p>

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3/11/2022	Eric Vander Mey, Rushing Written testimony	Proposed Modifications	The Council made some of the recommended modifications/clarifications as suggested in your testimony. Please see the annotated documents for notes on the changes adopted based on your testimony: https://sbcc.wa.gov/sites/default/files/2022-04/WSEC_Test_Proposed_Mods_recommendations.Pdf and Eric Vander Mey
3/11/2022	Mike Kennedy Written testimony	Proposed Modifications	The Council made some of the recommended modifications/clarifications as suggested in your testimony. Please see the annotated documents for notes on the changes adopted based on your testimony: https://sbcc.wa.gov/sites/default/files/2022-04/WSEC_Test_Proposed_Mods_recommendations.Pdf and Mike Kennedy
3/11/2022	Mike Kennedy Written testimony	Proposed Modification Section C403.3.4	Most of the proposed modifications to the boiler requirements were adopted as suggested in testimony. For specific actions taken, see Categorized Kennedy Boilers_031122_R2(002).Pdf(wa.gov)
3/11/2022	Mike Kennedy Written testimony	Proposed Modifications Section C404.2	Most of the proposed modifications to the water heater efficiency table were adopted as suggested but may have been renumbered. Please see the CR103 form , page 149, for the final adopted version
3/11/2022	Mike Kennedy Written testimony	Proposed Modifications Section C406	The Council adopted some of the changes suggested for Section C406, but declined or modified others. For specific actions taken, please see Categorized Kennedy C406_031122_R5.Pdf(wa.gov)
3/11/2022	Mike Kennedy Written testimony	Proposed Modifications Section C407	The changes proposed were adopted into the final rule, with some modifications. The Mandatory Requirements in Table C407.2 were modified to show that all of Section C411 is referenced.
3/11/2022	Mike Kennedy Written testimony	Proposed Modification Section C411	The final rule includes the changes suggested in Option 2 of the submitted comments, but also includes the text of Exception 3 from Option 1. For other specific actions taken in regard to this testimony, see https://sbcc.wa.gov/sites/default/files/2022-03/Categorized_Kennedy_C411_031122_R2F.Pdf
3/11/2022	Laurel Schandelmier, Glumac Written testimony	Proposed Modifications	The Council declined to make the modifications suggested in testimony. It is suggested that you submit these ideas as a code change proposal for the 2024 code cycle.
3/9/2022	Rupal Choksi, Madison Indoor Air Quality	Proposed Modification Section C403.13	The section was adopted as written in the CR102. It was felt the proposed increase in

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	Written testimony		stringency for items 2 and 3 would need to be proposed as a code change for the next cycle.
3/11/2022	Eric Truskoski, Bradford White Written testimony	Proposed Modifications Section C404.2	The suggested updates to the definitions were adopted as part of the final rule. The Council declined to make the other suggested modifications proposed in testimony.
3/11/2022	Bob Gunn, Seinergy Written testimony	Proposed Modification Section C405.3	A version of the suggested modification to Section C405.3 was adopted as part of the final rule. The final language reads: “... shall have a photosynthetic photon efficacy measured at the lamp for luminaires with serviceable or removable lamps or at the luminaire for integrated, non-serviceable luminaires of not less than 1.7 µmol/J for green-houses and not less than 1.9 µmol/J for all other indoor growing spaces as defined ...”
3/11/2022	Nicholas Hagedorn, Hawthorne Written testimony	Proposed Modification Section C405.3	A version of the suggested modification to Section C405.3 was adopted as part of the final rule. The final language reads: “... shall have a photosynthetic photon efficacy measured at the lamp for luminaires with serviceable or removable lamps or at the luminaire for integrated, non-serviceable luminaires of not less than 1.7 µmol/J for green-houses and not less than 1.9 µmol/J for all other indoor growing spaces as defined ...”
3/11/2022	Amanda Falkenhagen, Rushing Written testimony	Proposed Modifications Section C405	The suggested modification to Section C405.2.8.3 was adopted as part of the final rule. However, the Council did not elect to make the suggested clarification to Section C405.5.1. You would be welcome to submit a code change for the next cycle.
3/11/2022	Andi Burnham Written testimony	Proposed Modifications Section C407	Table C407.2 was modified to include Section C403.1.4 for mandatory compliance. However, Sections C403.8.1 and C403.8.4 were retained within the table in the final rule.
3/11/2022	Ian Robinson Written testimony	Proposed Modification Section C407	The Council declined to make the modifications suggested in testimony. It is suggested that you submit this as a code change proposal for the 2024 code cycle.
3/11/2022	Michael Rosenberg, PNNL Written testimony	Proposed Modification Section C407	The suggested modifications to the tables in Section C407 were adopted as part of the final rule.
3/11/2022	Michael Rosenberg, PNNL Written testimony	Proposed Modifications Appendix D	The suggested modifications to Appendix D were adopted as part of the final rule.
2/24/2022	Gary Heikkinen, NW Gas Association Written testimony	Carbon Emission Factor	The Council declined to make any changes to carbon emissions metric as proposed in the CR102.

From		Subject	Response
		Oppose/ Modify proposal 156 / Section C407	
3/11/2022	Traci Hanegan, Coffman Engineers Written testimony	Proposed Modifications Oppose TSPR, 103, 136	As suggested in your item 2, a modification was made to both the heat pump space heating and heat pump water heating sections to add exceptions for facilities requiring emergency backup systems as part of the final rule. The suggested language was further modified, based on other testimony provided, as follows: Essential facilities. Group I-2 and Group I-3 occupancies that by regulation are required to have in place redundant emergency backup systems. For the remainder of your suggestions, these go beyond what is proposed in the CR102 and would need to be submitted as code change proposals for the 2024 code cycle.
1/30/2022	Joe, 350.org Written testimony	Gen. Support	The Council adopted most of the proposed rule. The proposed changes for CMU walls from Proposals 207 and 208 were not adopted. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. There were a number of editorial changes adopted to help clarify the intent and simplify the text. Please see https://sbcc.wa.gov/sites/default/files/2022-07/WSR_22_14_091_full2021WSEC_C.pdf for a description of the changes made in the final adoption.
2/23/2022	Nancy Helget Written testimony	General Support	The Council adopted most of the proposed rule. The proposed changes for CMU walls from Proposals 207 and 208 were not adopted. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. There were a number of editorial changes adopted to help clarify the intent and simplify the text. Please see https://sbcc.wa.gov/sites/default/files/2022-07/WSR_22_14_091_full2021WSEC_C.pdf for a description of the changes made in the final adoption.
2/24/2022	Luke Howard, Dept. of Commerce Written testimony	General Support: Support 156	The Council adopted most of the proposed rule, including the carbon emission metric for electricity as proposed in Proposal 156. The proposed changes for CMU walls from Proposals 207 and 208 were not adopted. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. There were a number of editorial changes adopted to help clarify the intent and simplify the text. Please

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2/25/2022	Marc Sullivan Written testimony	Electrification/ Gen Support	The Council adopted most of the proposed rule. The proposed changes for CMU walls from Proposals 207 and 208 were not adopted. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. There were a number of editorial changes adopted to help clarify the intent and simplify the text. Please see https://sbcc.wa.gov/sites/default/files/2022-07/WSR_22_14_091_full2021WSEC_C.pdf for a description of the changes made in the final adoption.
2/25/2022	Andrea Smith, BIAW Written testimony	General	The Council adopted most of the proposed rule. The proposed changes for CMU walls from Proposals 207 and 208 were not adopted. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. There were a number of editorial changes adopted to help clarify the intent and simplify the text. Please see https://sbcc.wa.gov/sites/default/files/2022-07/WSR_22_14_091_full2021WSEC_C.pdf for a description of the changes made in the final adoption.
3/10/2022	Jack Burkman, Port of Vancouver Board of Commissioners Written testimony	General Support: Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that neither of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment. Most of the rest of the proposed rule was adopted, except for the proposed changes for CMU walls from Proposals 207 and 208.
3/10/2022	Dow Constantine, King County Executive Claudia Balducci, King County Council Sofia Aragon, Mayor, City of Burien	General Support: Support specific to proposals 103, 136, 146, 179, 178, 115, 78, 208	The Council adopted most of the proposed rule. The proposed changes for CMU walls from Proposals 207 and 208 were not adopted. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. There were some minor editorial changes made to Section C411 as proposed in Proposal 078 and Section C406 as proposed in Proposal 146.

	From	Subject	Response
	<p>Mary Lou Pauly, Mayor, City of Issaquah</p> <p>Penny Sweet, Mayor, City of Kirkland</p> <p>Salim Nice, Mayor, City of Mercer Island</p> <p>Angela Birney, Mayor, City of Redmond</p> <p>Jessyn Farrell, City of Seattle Office of Sustainability & Environ.</p> <p>Nathan Torgelson, City of Seattle DCI</p> <p>Keith Scully, Mayor, City of Shoreline</p> <p>Written testimony</p>		
3/11/2022	<p>Lynne Robinson, Mayor, City of Bellevue</p> <p>Written testimony</p>	<p>General Support: Support specific to proposals 103, 136, 146, 179, 178, 115, 78, 208</p>	<p>The Council adopted most of the proposed rule. The proposed changes for CMU walls from Proposals 207 and 208 were not adopted. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. There were some minor editorial changes made to Section C411 as proposed in Proposal 078 and Section C406 as proposed in Proposal 146.</p>
3/11/2022	<p>Kirsten Smith, Amy Wheelless, Shift Zero</p> <p>Written testimony</p>	<p>General Support</p>	<p>The Council adopted most of the proposed rule. The proposed changes for CMU walls from Proposals 207 and 208 were not adopted. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. There were some minor editorial changes made to Section C411 as proposed in Proposal 078 and Section C406 as proposed in Proposal 146.</p>
3/11/2022	<p>Sean Denniston, New Buildings Institute</p> <p>Written testimony</p>	<p>General Support: Support specific to proposals 103, 136</p>	<p>The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that neither of these proposals require retrofit, and like for like</p>

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			replacement is allowed for space and water heating equipment. Most of the rest of the proposed rule was adopted, except for the proposed changes for CMU walls from Proposals 207 and 208.
3/11/2022	Amy Wheelless, Northwest Energy Coalition Written testimony	General Support	The Council adopted most of the proposed rule. The proposed changes for CMU walls from Proposals 207 and 208 were not adopted. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. There were some minor editorial changes made to Section C411 as proposed in Proposal 078 and Section C406 as proposed in Proposal 146.
3/11/2022	Letter from 50 individual architects, designers, and building industry professionals and firms working in Washington State Written testimony	General Support: Support specific to proposals 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that neither of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment. Most of the rest of the proposed rule was adopted, except for the proposed changes for CMU walls from Proposals 207 and 208.
3/11/2022	Letter from 18 environment and climate organizations Written testimony	General Support: Support specific to proposals 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that neither of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment. Most of the rest of the proposed rule was adopted, except for the proposed changes for CMU walls from Proposals 207 and 208.
3/11/2022	Naghmana Sherazi, Climate Justice Written testimony	General Support: Support specific to proposals 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that neither of these

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			proposals require retrofit, and like for like replacement is allowed for space and water heating equipment. Most of the rest of the proposed rule was adopted, except for the proposed changes for CMU walls from Proposals 207 and 208.
3/11/2022	Adam Hutchinson, E. WA. Masonry Producers Assoc. Written testimony	CMU/Mass Wall Oppose Proposals 207, 208	These two proposals were not adopted as part of the permanent rule. The requirements for CMU walls remains as required in the 2018 code.
3/11/2022	Bruce Corigliano, White Block Co. Written testimony	CMU/Mass Wall Oppose Proposals 207, 208	These two proposals were not adopted as part of the permanent rule. The requirements for CMU walls remains as required in the 2018 code.
3/11/2022	Kevin Krebs, Masonry Industry Promotion Group Written testimony	CMU/Mass Wall Oppose Proposals 207, 208	These two proposals were not adopted as part of the permanent rule. The requirements for CMU walls remains as required in the 2018 code.
3/11/2022	Blair Harter, Basalite Concrete Products Written testimony	CMU/Mass Wall Oppose Proposals 207, 208	These two proposals were not adopted as part of the permanent rule. The requirements for CMU walls remains as required in the 2018 code.
3/11/2022	Brian Healow, Mutual Materials Written testimony	CMU/Mass Wall Oppose Proposals 207, 208	These two proposals were not adopted as part of the permanent rule. The requirements for CMU walls remains as required in the 2018 code.
3/11/2022	Mark McGinley, University of Louisville Written testimony	CMU/Mass Wall Oppose Proposals 207, 208	These two proposals were not adopted as part of the permanent rule. The requirements for CMU walls remains as required in the 2018 code.
3/11/2022	Tom Young, NW Concrete Masonry Assoc. Written testimony	CMU/Mass Wall Oppose Proposals 207, 208	These two proposals were not adopted as part of the permanent rule. The requirements for CMU walls remains as required in the 2018 code.
3/11/2022	Tonia Sorrell-Neal, Masonry Institute of Washington Written testimony	CMU/Mass Wall Oppose Proposals 207, 208	These two proposals were not adopted as part of the permanent rule. The requirements for CMU walls remains as required in the 2018 code.
3/7/22	Larry Andrews, Andrews Mechanical Written testimony	Demand response WH, Radiant heating insulation (existing language—no changes proposed), Compressed air systems, High	The Council adopted these proposals as part of the permanent rule. Please note that the requirement for radiant heating insulation is a current requirement and is not proposed to be changed by this rulemaking. The Council did adopt some editorial changes to the requirements for boiler controls. The definitions for commercial and process boiler were

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		<u>temp. storage tanks, Hydronic system flow rates, Boiler controls –</u> Oppose 99, 174, 193, 166, 133, 139	replaced with a definition for process application, and the text in Section C403.3.4 revised accordingly. The text was also cleaned up, with an exception added for multifamily buildings, as these were not found to be cost effective. The associated table was also corrected and aligned with the revised text. See page 96 of https://sbcc.wa.gov/sites/default/files/2022-07/WSR_22_14_091_full2021WSEC_C.pdf for the adopted code language for boiler controls.
3/7/22	Larry Andrews, Andrews Mechanical Written testimony	<u>Sections C406 and C407:</u> Oppose 206, 146, 230, 070, 122, 156	The Council adopted a number of editorial changes to Sections C406 and C407 in the permanent rule. However, the Council retained the carbon emissions factors as proposed, and harmonized the other tables for consistency with these metrics.
3/9/22	Larry Andrews, Andrews Mechanical Written testimony	<u>Demand Response Water Heater:</u> Oppose 99	The Council adopted this proposal as part of the permanent rule.
3/11/22	Larry Andrews, Andrews Mechanical Written testimony	<u>PTHP controls</u> Oppose 194	The Council adopted this proposal as part of the permanent rule.
3/8/2022	Nicolas Garcia, Washington Public Utility Districts Association Written testimony	<u>On-Site Renewables:</u> Concern regarding proposal 078	The Council moved forward with adopting the proposed rule for on-site renewables, but with a number of editorial changes. A new exception was added for buildings with insufficient roof areas, and guidance provided on how additional efficiency credits may be substituted, clarifying the requirements in Section C411.1.1. Clarifying changes were also made in Section C411.2 and C411.2.1. The Council felt it was important to move forward with the requirement that buildings produce some of the energy they will be using. Since this requirement is only generating a portion of the building's need, it is not anticipated that much would be returned to the grid.
3/11/2022	Jim Purekal, SunPower Written testimony	<u>On-Site Renewables:</u> Support 078	The Council moved forward with adopting the proposed rule for on-site renewables, but with a number of editorial changes. A new exception was added for buildings with insufficient roof areas, and guidance provided on how additional efficiency credits may be substituted, clarifying the requirements in Section C411.1.1. Clarifying changes were also made in Section C411.2 and C411.2.1. The Council felt it was important to move forward with the requirement that buildings produce some of the energy they

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			will be using. Since this requirement is only generating a portion of the building's need, it is not anticipated that much would be returned to the grid.
3/10/2022	Barry Jostol, Mechanical Sales Written testimony	Boiler controls: Oppose 139	The Council did adopt new requirements for boiler controls but made some changes in the final rule. The definitions for commercial and process boiler were replaced with a definition for process application, and the text in Section C403.3.4 revised accordingly. The text was also cleaned up, with an exception added for multifamily buildings, as these were not found to be cost effective. The associated table was also corrected and aligned with the revised text. See page 96 of https://sbcc.wa.gov/sites/default/files/2022-07/WSR_22_14_091_full2021WSEC_C.pdf for the adopted code language for boiler controls.
3/11/2022	Kevin Duell, Northwest Natural Written testimony	Carbon Emissions: Oppose 156	The Council did adopt the carbon emissions metric for electricity, as noted in Proposal 156, in the final rule. The Council felt this metric best matched state law in compliance with the Clean Energy Transformation Act.
3/07/2022	Sen. Mark Schoesler Written testimony	Electrification: Oppose Proposals 103,136,179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Dan Kirschner, NW Gas Association Written testimony	Electrification: Oppose Proposals 103,136,179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals

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			require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	David Hutzenbiler, McKanna Bishop Joffe Scott Middleton, General Counsel, Mechanical Contractors Assoc. of Western Washington Written testimony	HP Space Heating Legal Challenge to Proposal 103	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both adopted with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that neither of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Jan Hasselman, Senior Attorney, Earthjustice Written testimony	Support Proposals 103, 136; no issue with Federal Preemption	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that neither of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Lorna Luebbe, Puget Sound Energy Greg Hesler, Avista Alyn Spector, Cascade Natural Gas MardiLyn Saathoff, NW Natural Written testimony	Electrification, On-Site Renewables Oppose 103, 136, 179, 78	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment. The Council moved forward with adopting the proposed rule for on-site renewables, but with a number of editorial changes. A new exception was added for buildings with insufficient roof areas, and guidance provided on how additional efficiency credits may be substituted, clarifying the requirements in Section C411.1.1. Clarifying changes were also made in Section C411.2 and C411.2.1. The Council felt it was important

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			to move forward with the requirement that buildings produce some of the energy they will be using. Since this requirement is only generating a portion of the building's need, it is not anticipated that much would be returned to the grid.
1/20/2022	Chris Hellstern, Miller Hull Partnership LLC Written testimony	Electrification Support 103, 136,179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/01/2022	Robin Crowder, 21 Acres Written testimony	Heat Pumps Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/02/2022	Mark Bratt, AIA Written testimony	HP, Solar ; Urge caution in adopting proposals 78, 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment. The Council moved forward with adopting the proposed rule for on-site renewables, but with a number of editorial changes. A new exception was added for buildings with insufficient roof areas, and

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			guidance provided on how additional efficiency credits may be substituted, clarifying the requirements in Section C411.1.1. Clarifying changes were also made in Section C411.2 and C411.2.1. The Council felt it was important to move forward with the requirement that buildings produce some of the energy they will be using. Since this requirement is only generating a portion of the building's need, it is not anticipated that much would be returned to the grid.
2/07/2022	Toniann Reading Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/07/2022	Kristi Tripple, Rowley Properties Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/07/2022	Kelly Byrnes- Blake, Northwest PK Solutions Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type

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			of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/09/2022	Thomas and Pamela Allen Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating was adopted mostly as proposed in the CR102. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/14/2022	International Brotherhood of Electrical Workers Local #77 Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/14/2022	William E. Butler, WEB Properties Inc. Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems.. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/15/2022	Meghan Anderson Written testimony	Heat Pumps Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is

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			allowed for space and water heating equipment.
2/16/2022	Rafik Gindy, CBO, City of Lakewood Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/17/2022	Sidney Beaumont Written testimony	Electrification Support All	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/17/2022	Dana Russell, Farmers Insurance Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/18/2022	Rachel (Rheya) Molloy Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is

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			allowed for space and water heating equipment.
2/21/2022	Wendy Krakauer Written testimony	Electrification Support 103	The Council adopted this proposal. Proposal 103, the proposal regarding heat pump space heating was modified with an additional exception for those occupancy groups required to provide backup systems.
2/22/2022	Debbie McVicker Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/22/2022	Stan Price Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/22/2022	Pat Nordby Written testimony	Heat Pumps Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/22/2022	Rob Harmon Written testimony	Heat Pumps Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is

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			allowed for space and water heating equipment.
2/23/2022	Carolyn Loren Written testimony	Heat Pumps Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/23/2022	Iris Antman Written testimony	Heat Pumps Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/23/2022	Bob Russell Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/23/2022	Jesica Kiser, Anacortes Chamber of Commerce Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/24/2022	Susan Crampton Written testimony	Heat Pumps Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified

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			with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/24/2022	Lance Beck, Greater Spokane Valley Chamber of Commerce Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/24/2022	Devon Kellogg Written testimony	Electrification Support 103, 136	The Council adopted these proposals Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/25/2022	Tammy J Sagastizado Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/25/2022	Sharon Lee, Low Income Housing Institute Written testimony	Heat Pumps Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas.

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			Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/25/2022	Rosella Mosby, Washington Farm Bureau Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/25/2022	Meghan Anderson, Part 2 Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/25/2022	Ric Berkholtz Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/25/2022	Craig V. Olson, WA ACCA Written testimony	Electrification Oppose 103, 136, 179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted primarily as proposed in the CR102. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals

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			require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/25/2022	Scott Ongley, NW Hearth, Patio & Barbecue Assoc. Written testimony	Electrification Oppose 103, 136, 179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/25/2022	Louise Kulzer Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
2/28/2022	Julie Palm Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/3/2022	Matt Millbauer Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is

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			allowed for space and water heating equipment.
3/3/2022	Dean Doces Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/7/2022	Avaly Scarpelli, BIA of Clark Co. Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/8/2022	Karin Eastby, MBAKS Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Jennifer Thomas, Spokane Home Builders Association Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.

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3/10/2022	Deb Flagen, Untamed Construction Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Corey Condrón & Craig Roberts, Condrón Homes Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Angela White, Olympia Master Builders Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Alan Nolan Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Todd Allred, PHCC Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup

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			systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	CleAnn Goodell Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Todd Hansen Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Lynn Merle Dronen Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Debra Anne Ciarlo Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is

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			allowed for space and water heating equipment.
3/11/2022	Bill McKay, Mayor, City of Kennewick Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Glenn Mesick, Synergy Sales Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/7/2022	Tim Attebery, AGC of Washington Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/7/2022	Alyn Spector, Cascade Natural Gas Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.

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3/7/2022	Larry Andrews, Andrews Mechanical Written testimony	HP Space Heating Oppose 103	The Council adopted this proposal. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems.
3/7/2022	Larry Andrews, Andrews Mechanical Written testimony	HP Water Heating Electrification Oppose 136, 179	The Council adopted these proposals. Proposal 179 requiring electrical outlets at gas appliance locations, was adopted as proposed in the CR102. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that this proposal does not require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Larry Andrews, Andrews Mechanical via Office of the Attorney General Written testimony	Complaint of process in considering proposals 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/7/2022	Kyle Target, Walla Walla Chamber of Commerce Written testimony	HP Proposals Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/7/2022	Debbie Copple, Sky Valley Chamber of Commerce Written testimony	Electrification Oppose 103, 136, 179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.

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3/8/2022	Jana Schultheis, Schweitzer Engineering Laboratories Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/8/2022	Douglas Ito, Tammie Sueirro, AIA Washington Council Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/9/2022	Rupal Choksi, Madison Indoor Air Quality Written testimony	HP Space heating Oppose 103	The Council adopted this proposal. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems.
3/9/2022	Billy Hetherington Written testimony	Electrification Oppose 103, 136, 179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/9/2022	Vicki Thomas, League of Women Voters of Bellingham/What com County Written testimony	Electrification Support 103, 136, 179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.

	From	Subject	Response
3/10/2022	<p>Affordable Housing Advocates:</p> <p>Patience Malaba, Housing Development Consortium of Seattle-King County</p> <p>Sharon Lee, Low Income Housing Consortium</p> <p>Caroline Engle, Seattle Housing Authority</p> <p>Naghmana Sherazi, Spokane Low Income Housing Consortium</p> <p>Frederick Padjen, Ellensburg Planning Commission</p> <p>Meg Ludlum, Advocate</p> <p>Carrie Parks, Affordable Housing Advocate</p> <p>Carly Colgan, South Puget Sound Habitat for Humanity</p> <p>Paul Knox, Landlord</p> <p>Marry Ellen Robinson, Sisters of the Holy Names of Jesus and Mary</p> <p>Gary Akizuki</p> <p>Written testimony</p>	<p>Electrification</p> <p>Support 103, 136</p>	<p>The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.</p>
3/10/2022	<p>Jennifer Hanscom, Washington State</p>	<p>Electrification</p> <p>Support 103, 136</p>	<p>The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified</p>

	From	Subject	Response
	Medical Association Max Savishinsky, Washington Physicians for Social Responsibility plus 137 other signatories Written testimony		with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Tim and Maria Carr, Silvana Plumbing Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Sean & Leona Egeland, Ridgeline Plumbing Written testimony	HP Water Heating Oppose 136	The Council adopted this proposal, but modified it to allow any type of supplemental water heating, including gas. Please also note that this proposal does not require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/10/2022	Rod Kauffman, BOMA Written testimony	Electrification Concerns regarding 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Local Elected Officials – King County, Bellingham, Snohomish, Vancouver, Pierce County, Kirkland, Spokane, Bothell, Bellevue, Kenmore, Bonny Lake, Seattle,	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is

	From	Subject	Response
	Anacortes, Mercer Island, Blaine, Tieton, Arlington, Federal Way, Centralia, Redmond, Bremerton, Gig Harbor, Tacoma, Hoquiam, Olympia, Shoreline, Port Townsend, Edmonds, Port Orchard Burien, Whatcom County, Bainbridge Island, Carnation, Duvall (same letter also submitted by Michael Lilliquist) Written testimony		allowed for space and water heating equipment.
3/11/2022	Cheryl Selby, Mayor, City of Olympia Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Patrick Reay, Port of Walla Walla Written testimony	HP Proposals Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Kyle Bergeron, AHRI Written testimony	HP Space Heating Oppose 103	The Council adopted this proposal. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those

From		Subject	Response
			occupancy groups required to provide backup systems.
3/11/2022	Kyle Bergeron, AHRI Written testimony	HP Water Heating Oppose 136	The heat pump water heating proposal, 136, was adopted, but modified to allow any type of supplemental water heating, including gas.
3/11/2022	Joshua Greene, A.O. Smith Corp. Written testimony	HP Proposals Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/22	Larry Andrews, Andrews Mechanical Written testimony	Carbon emissions Oppose 103, 136, 179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Joaquin Marchand, L.I.G.H.T. Foundation Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Nathan Gorton, Mary Hull-Drury, Washington Realtors Written testimony	Electrification Oppose 103, 136, 179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.

	From	Subject	Response
3/11/2022	Mark Murdoch, Roberts Gordon Written testimony	HP Space Heating Oppose 103	The Council adopted this proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. Please note that this proposal does not require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Duane Jonlin, City of Seattle Written testimony	Heat Pumps Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	J. Bryan Halbert, Halbert Construction Services Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Patrick Stone, Rapid Engineering Written testimony	HP Space Heating Oppose 103	The Council adopted this proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. Please note that this proposal does not require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Mitchell Brush, Weather-Rite Written testimony	HP Space Heating Oppose 103	The Council adopted this proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. Please note that this proposal does not require retrofit, and like for like replacement is allowed for space and water heating equipment.

From		Subject	Response
3/11/2022	Jeff Sund, Bananza Written testimony	HP Space Heating Oppose 103	The Council adopted this proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. Please note that this proposal does not require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Holly Townes Written testimony	HP Proposals Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Randi Hammer, Washington Potato & Onion Assoc. Written testimony	HP Proposals Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Anne Kelly, Ceres, on behalf of Business for Innovation Climate and Energy Policy Undersigned by 48 companies, healthcare systems, and associations including Adobe, Autodesk, IKEA Retail USA, PayPal, JLL, and alliances representing	HP Proposals Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.

From		Subject	Response
	40 hospitals and over 1,000 health care facilities Written testimony		
3/11/2022	Robert Torbin, Omega Flex Written testimony	Electrification Oppose 103, 136, 179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Ted Williams, Natural Gas Direct Written testimony	Electrification Oppose 103, 136, 179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Karen Meyers, Rheem Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Matthew Solak, Pacific Propane Gas Association Written testimony	Electrification Oppose 103, 136, 179	The Council adopted these three proposals. Both 103, the proposal regarding heat pump space heating, and 179 requiring electrical outlets at gas appliance locations, were adopted as proposed in the CR102. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.

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3/11/2022	Lindsey Grad, SEIU Healthcare Labor Unions Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Karl Dye, Tri-City Development Council Written testimony	Electrification Oppose 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Karen Lindquist, Interfaith Community Sanctuary Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
3/11/2022	Cherie Holman Written testimony	Electrification Support 103, 136	The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.
	General public emails in support of the heat pump proposals: 102 comments received		The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those

From	Subject	Response
		<p>occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.</p>
	<p>General public emails in opposition to the heat pump proposals: 224 comments received</p>	<p>The Council adopted these proposals. Proposal 103, the proposal regarding heat pump space heating and Proposal 136 were both modified with an additional exception for those occupancy groups required to provide backup systems. The heat pump water heating proposal, 136, was modified to allow any type of supplemental water heating, including gas. Please also note that none of these proposals require retrofit, and like for like replacement is allowed for space and water heating equipment.</p>